

STATE OF MICHIGAN



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TDD or Voice

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TO: Members of the Construction Code Commission
FROM: Lloyd O. Kraft, Chief *Lloyd O. Kraft*
Barrier Free Design Division
SUBJECT: Interpretation Request

Question: Is it the intent of Sections 512.7.4 and 812.3 of the State Building Code to require doorways, such as toilet/bath room doorways, in non-barrier free R-1 and R-2 units to provide 32 inch clear width?

Answer: Yes, where a non-barrier free unit does not meet the requirements of a dwelling unit, then access to all points shall be provided by doorways with 32 inch clear width. However, pursuant to the exception in Section 812.3, if the non-barrier free units meet the requirements of a dwelling unit as defined in Section 201.0, and provides, "complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking, and sanitation," then the clear width can be reduced to not less than 28 inches.

Commentary: Section 512.7.4 requires interior access to all points on each level be provided doorways meeting the requirements of Section 812. Section 812.3 is titled means of egress doorways, however the Section 512.7.4 reference to the same section provides dimension requirements for all doorways required to provide barrier free interior access to all points. The code is specific in exempting non-barrier free dwelling units and the code clearly defines dwelling unit.

It cannot be inferred that if a unit is not a barrier free unit that no other portions of the barrier free components of the State Construction Code apply, except where specifically stated.

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